

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

Cr. No. H-14-46

KAREN SIMMONS

UNOPPOSED MOTION FOR CONTINUANCE

The Defendant, Karen Simmons, moves this Court for a thirty-day continuance of the motions deadline, and the pretrial conference and trial dates, and respectfully shows as follows:

Ms. Simmons was charged with theft of government property, in violation of 18 U.S.C. § 641. The pretrial motions deadline was March 4, 2014, the pretrial conference is set for April 7, 2014, and the jury selection and trial is set for April 21, 28, 2014.

Discovery in this case is ongoing, and undersigned counsel has begun her own legal and factual investigation. Undersigned counsel has identified certain legal and factual issues that require further investigation. Undersigned counsel needs more time to complete her investigation and analysis, and then to file pretrial motions, if necessary, and to prepare for trial, if necessary. Moreover, additional time is needed

to discuss the case with Ms. Simmons.

The defendant respectfully submits that the best interests of justice served by granting this motion for a continuance substantially outweigh the interests of the defendant and the community in a speedy trial, and that failure to grant the continuance would deprive defense counsel of sufficient time to prepare for trial.

Assistant United States Attorney Tina Ansari is unopposed to this Motion for Continuance.

Respectfully submitted,

MARJORIE A. MEYERS
Federal Public Defender
Southern District of Texas
Texas State Bar No. 14003750
Southern District of Texas No. 3233

By s/ Sarah Beth Landau
SARAH BETH LANDAU
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CERTIFICATE OF CONFERENCE

I certify that I conferred with Assistant United States Attorney Tina Ansari, on March 21, 2014, and determined that the United States is unopposed to this motion for continuance.

s/ Sarah Beth Landau
SARAH BETH LANDAU

CERTIFICATE OF SERVICE

I certify that on March 24, 2014, a copy of the foregoing Unopposed Motion to Continue was served by Notification of Electronic Filing and was delivered by email to the office of Assistant United States Attorney Tina Ansari at 1000 Louisiana, Suite 2300, Houston, Texas 77002.

s/ Sarah Beth Landau
SARAH BETH LANDAU